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January 21, 2010

Office of Science and Technology Policy
Attn: Open Government Recommendations
Re: *Public Access Policies for Science and Technology Funding
Agencies Across the Federal Government*
Submitted via email: publicaccess@ostp.gov

To Whom It May Concern:

On behalf of the American Association for the Advancement of Science (AAAS), thank you for the opportunity to submit comments on public access policies for science and technology funding agencies. Improving access to scientific and technical information is a longstanding commitment of AAAS and its three peer-reviewed journals, *Science*, *Science Translational Medicine* and *Science Signaling*.

Most nonprofit societies and publishers disseminate research articles to a range of audiences. The AAAS journals, including *Science*, make all of their peer-reviewed research articles freely available to the research community and the general public 12 months after publication. In addition, the content from our journals is disseminated through a wide variety of means, including reasonably priced annual subscriptions, institutional site-wide licenses, and a variety of large database services. Furthermore, World Health Organization initiatives such as HINARI (the Health InterNetwork: Access to Research Initiative), AGORA (Access to Global Online Resources in Agriculture), and SciDev.Net all provide *Science* and content from its sibling journals to scientists in the world's poorest countries at no cost. Articles with important public health implications are always made freely available as soon as they are published. *Science* also uses multimedia and Web 2.0 tools to enhance opportunities for scientists, students and others to engage in dialogue around substantive topics.

AAAS believes it is important that the discussion surrounding public access must clearly distinguish between providing access to research results in support of scientific progress and access to scientific information as a crucial element of public engagement to enhance the understanding of science and its implications. The primary target audience for the technical research papers published in the scientific literature has always been the research community that utilizes the information to replicate, reproduce and expand that knowledge base.

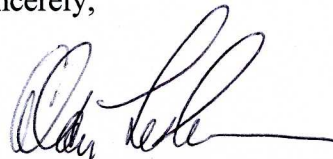
Appropriate public access policies can increase the access of scientists to the published literature. However, whatever their public access policies, federal science and technology agencies will retain a responsibility to inform the public about what federally supported research demonstrates, particularly as it relates to health and medicine, and to enhance public understanding of the peer-reviewed literature. Simply increasing public access will not adequately substitute for these public engagement activities, and should not be seen as a way to replace them. The federal government must continue to support public education programs as well as sustain repositories of scientific information in support of the conduct of research.

As for posting to federal repositories (e.g., PubMedCentral), AAAS journals allow authors who are required by their funding agency to make their research publicly available to post in the repository the "accepted version" of a paper six months after publication, provided the posting is linked back to the original published version and includes the published paper's full reference citation. The "accepted version" is the version of the paper accepted for publication after changes resulting from peer review, but before AAAS's editing, image quality control, and production. Many errors are corrected in final, copy-edited versions of manuscripts, and additional corrections to some research articles may arise several months after publication. *Science* currently takes responsibility for clearly linking corrections, retractions, letters and technical comments to the original paper posted on www.sciencemag.org. This policy is consistent with the recommendations outlined in the recent report on public access by the Scholarly Publishing Roundtable.

In 1880, Thomas Edison took a pioneering step in communicating the results of research to a broad audience of scientists by creating a truly multidisciplinary journal called *Science*. AAAS will continue to experiment with different mechanisms for disseminating scientific information as technology evolves, and we welcome the introduction of experimental models by other publishers, believing that a diversity of approaches is the best strategy for advancing science and serving the public good. Hence, we believe that public access policies should reflect that diversity of perspectives and allow for evolutionary change in models for disseminating scientific information.

If you have any questions regarding these comments please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Leshner", written in a cursive style.

Alan I. Leshner